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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 FRESNO DIVISION
13

14 DEBBIE G. BISSMEYER,
15

16 Plaintiff,

17 v.

18 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

19 Defendant.¹

No. 1:21-cv-00209-BAM

STIPULATION AND ORDER FOR EXTENSION
TO FILE DEFENDANT'S OPPOSITION TO
PLAINTIFF'S OPENING BRIEF

20 IT IS HEREBY STIPULATED, by and between Debbie Bissmeyer (Plaintiff) and Kilolo
21 Kijakazi, Acting Commissioner of Social Security (Defendant), by and through their respective
22 counsel of record, that, with the Court's approval, Defendant shall have an extension of time of
23 forty-five (45) days to file a Response to Plaintiff's Opening Brief. This is Defendant's first
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26 ¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant to
27 Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted, therefore,
28 for Andrew Saul as the defendant in this suit. No further action need be taken to continue this suit
by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 request for an extension on her Response to Plaintiff's Opening Brief. The current due date is
2 October 11, 2022. The new date will be November 25, 2022. All other deadlines will extend
3 accordingly.
4

5 Good cause exists for this request. Defendant's counsel has worked diligently to meet the
6 timelines provided by the Court but has been prevented from doing so by her very full briefing
7 schedule. Defendant's counsel has eighty-one other active cases in various stages of litigation,
8 and 18 responsive briefs due in the next 30 days. Additionally, Defendant's counsel has other
9 responsibilities with another practice group in her office where the work cannot be extended.
10 Defendant requests this extension in good faith, and with no intent to delay these proceedings
11 unnecessarily. Defendant apologizes to the Court for any inconvenience caused by this delay.
12 Defendant's counsel contacted Plaintiff's counsel on September 9, 2022, and she had no objection
13 to this request.

14 Respectfully submitted,

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16 DATE: September 9, 2022

/s/ Jacqueline Forslund
JACQUELINE FORSLUND
Attorney for Plaintiff
(as approved via email)

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19 PHILLIP A. TALBERT
United States Attorney

20 DATE: September 9, 2022

21 By s/ Margaret Lehrkind
MARGARET LEHRKIND
Special Assistant United States Attorney

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23 Attorneys for Defendant
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ORDER

Pursuant to the parties' request, and for good cause shown, IT IS SO ORDERED that Defendant shall have an extension, up to and including November 25, 2022, to respond to Plaintiff's Motion for Summary Judgment. All other dates in the Court's Amended Scheduling Order (Doc. No. 8.) shall be extended accordingly.

IT IS SO ORDERED.

Dated: September 12, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE